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Via Fax: 202-493-2251

Docket Management Facility (USCG-2003-14273)
U.S. Department of transportation
Room PL 401
400 Seventh Street, SW
Washington, DC 20590-0001

Re: Docket Number USCG-2001-14273 -22
Mandatory Ballast Water Management Program for U.S. Waters

On July 30, 2003, the U.S. Coast Guard proposed mandatory ballast water management practices for all vessels equipped with ballast tanks bound for ports or places within the U.S. and/or entering U.S. waters. At the same time, the mandatory ballast water management requirements for vessels entering into the Great Lakes and Hudson River from outside the U.S. Exclusive Economic Zone would remain unchanged.

Maritime Solutions, Inc. was established to introduce advanced technologies to the international marine and environmental marketplace. It accomplishes this mission by promoting innovative products and services, providing more effective solutions to traditional marine and environmental problems. Maritime Solutions is highly supportive of Coast Guard efforts to bring new technologies to bear in efforts to protect the marine environment against pollution threats; nonindigenous species included.

The introduction of nonindigenous species into new waterway environments via vessel ballast water discharges has been identified by the International Maritime Organization as one of the four greatest threats to the world's oceans, coastal and inland waters. These species often lack predators when introduced into areas where they have not previously been and can introduce diseases against which indigenous species will have little or no immunizing resistance. Unlike other forms of marine pollution, such as oil spills, where ameliorative action can be taken and from which the environment will eventually recover, the impact of invasive marine species are most often irreversible.

While we want to commend and thank the Coast Guard for its efforts to protect the marine environment, we are concerned that the proposed rulemaking exempts vessels from compliance, except for reporting, whenever their voyages do not take them into waters 200 nautical miles or greater from any shore for a sufficient length of time to conduct a ballast water exchange. In fact, these vessels would not be prohibited from discharging their ballast water in other areas of the U.S. other than the Great Lakes and the Hudson River.

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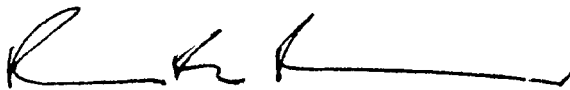
Rather than exempting a large population of vessels from having to protect the coastal and inland waters of the U.S. against nonindigenous species, we believe the proposed rulemaking should require vessels whose certificates or service is restricted to voyages that do not take them into waters 200 nautical miles or greater from any shore to comply by implementing one of the other alternative environmentally sound methods of ballast water management practices, namely: retention on board, alternative treatment, or discharge to reception facility.

The threat posed by ballast water is unique in many respects. Most importantly, to provide an effective block to the introduction of invasive marine species through ballast water discharge, the exclusion program must be as close to 100% effective as is possible and there can be no exemptions or loopholes in the regulations as otherwise the entire effort is doomed to failure. If viable nonindigenous species are allowed to pass through any gap, regulatory or otherwise, they will very likely repopulate and the environment put at risk.

With respect to alternative methods of ballast water treatment, we urge the Coast Guard to establish an alternative treatment standard. Ideally, the Coast Guard will adopt the same treatment standard that is now in the final stages of development by the International Maritime Organization. Nothing else, in our opinion, will speed the development and commercial availability of safe, effective, practical and cost effective onboard ballast water treatment systems more than the promulgation of the long awaited treatment standards.

We believe the proposed rulemaking, including the recommended modifications, will not only increase the Coast Guard's ability to protect U.S. waters against the introduction of nonindigenous species via ballast water discharges, but will also assist vessel owners by promoting the development and availability of alternative ballast water treatment systems and reception facilities.

Very truly yours,
Maritime Solutions, Inc.

A handwritten signature in dark ink, appearing to read 'R. E. Fredricks', with a long horizontal stroke extending to the right.

Richard E. Fredricks
Vice President